

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

WANDA ELIZABETH CRAVEN,

Plaintiff,

v.

REPUBLIC SERVICES, INC., et al.,

Defendants.

Civil Action No. 6:21-CV-00016 (NKM/RSB)

**JOINT NOTICE OF SETTLEMENT AND DEATH OF PLAINTIFF**

Plaintiff Wanda Elizabeth Craven (“Plaintiff”) and Defendants Republic Services, Inc. (“RSI”) and BFI Waste Services, LLC, d/b/a Allied Waste Services of Lynchburg/Republic Services of Lynchburg (“BFI”) (collectively, “Defendants”) (Plaintiff and Defendants being referred to collectively as the “Parties”), by and through their counsel, hereby jointly submit this Notice of Settlement and Death of Plaintiff, and state as follows:

1. On Friday, October 1, 2021, the Parties reached an agreement in principle to settle this matter.
2. On Monday, October 4, 2021, Plaintiff’s counsel informed Defendants’ counsel that Plaintiff had passed away.
3. Plaintiff’s counsel has advised Defendants’ counsel that Plaintiff’s son has been named as the executor of Plaintiff’s estate through her will. Plaintiff’s counsel further stated that Plaintiff’s son is in the process of proceeding in probate to be officially appointed as the executor of Plaintiff’s estate.

4. The Parties understand that the probate proceedings may take time, particularly in light of the delays caused by the ongoing COVID-19 pandemic.

5. Currently, the Parties are working to finalize an agreement memorializing the terms of the settlement of this case.

6. Upon completion of the probate proceedings, Plaintiff's son, as the executor of Plaintiff's estate, will promptly file a motion for substitution with this Court pursuant to Federal Rule of Civil Procedure 25(a) to replace Plaintiff in this case.

7. Thereafter, Plaintiff's son, as the executor of Plaintiff's estate, will execute the settlement agreement and release agreed upon by the Parties, on behalf of Plaintiff. In addition, a Joint Stipulation of Dismissal with Prejudice will be filed.

8. In light of the Parties' settlement, and to allow sufficient time for Plaintiff's son to be officially appointed as the executor of Plaintiff's estate to finalize the resolution of this matter, the Parties believe that this case should be placed in the Court's inactive docket and/or a stay should be entered, whichever is the Court's preference.<sup>1</sup>

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<sup>1</sup> The current deadline to complete discovery is May 31, 2022, *i.e.*, 105 days before the September 12, 2022 trial date in this matter. *See* Dkt. 12 and 13.

Dated: October 13, 2021

Respectfully submitted,

/s/ Brittany M. Haddox (with consent)

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Republic Services, Inc. and BFI Waste  
Services, LLC d/b/a Allied Waste Services of  
Lynchburg/Republic Services of Lynchburg*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of October 2021, the foregoing **JOINT NOTICE OF SETTLEMENT AND DEATH OF PLAINTIFF** was filed via this Court's CM/ECF system, which will cause of copy of the foregoing document to be served on the following counsel of record:

Brittany M. Haddox, Esq. (VSB #86416)  
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